

Susan S. Masterton  
Senior Counsel



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December 11, 2009

**VIA E-FILING**

Charles L.A. Terreni, Esquire  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29211

RE: Genesis Telecommunications, LLC v. United Telephone Company of the Carolinas  
d/b/a CenturyLink  
Docket No. 2009-311-C

Dear Mr. Terreni:

Enclosed please find the First Set of Interrogatories and Request for Production to Genesis Telecommunications, LLC filed on behalf of United Telephone Company of the Carolinas d/b/a CenturyLink in the above referenced docket. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Susan S. Masterton

SSM/rc

cc: All Parties of Record w/enc.

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2009-311-C**

IN RE: Genesis Telecommunications,	)	<b>UNITED TELEPHONE COMPANY OF</b>
LLC, Complainant/Petitioner v. United	)	<b>THE CAROLINAS, LLC d/b/a</b>
Telephone of the Carolinas d/b/a	)	<b>CENTURYLINK'S FIRST SET OF</b>
CenturyLink, Defendant/Respondent	)	<b>INTERROGATORIES AND REQUEST</b>
	)	<b>FOR PRODUCTION TO</b>
	)	<b>GENESIS TELECOMMUNICATIONS,</b>
	)	<b>LLC</b>

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**TO: Mr. John Lawrence**  
**Genesis Telecommunications, LLC**  
**1117 Reynolds Avenue**  
**Greenwood, SC 29649**  
**john@gogenesis.com**

In accordance with 26 S.C. Regs 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), United Telephone Company of the Carolinas, LLC d/b/a CenturyLink ("CenturyLink") requests that Genesis Telecommunications, LLC ("Genesis") respond to the following interrogatories and/or requests for production within twenty days of service.

**IT IS HEREIN REQUESTED:**

- A. That all information shall be provided to the undersigned counsel for CenturyLink in the format requested.
- B. That all responses to the below Requests shall be labeled using the same numbering as used herein.
- C. That any inquiries or communications relating to questions concerning clarifications of the information requested below be directed to the undersigned counsel for CenturyLink.

- D. That, in addition to the signature and verification at the close of Genesis's response, Genesis identify the name and title of the person responsible for the information contained in each answer.
- E. That if the response to any Request is that the information requested is not currently available, state when the information will be available.
- F. That these Requests be deemed continuing so as to require Genesis to supplement or amend their responses as any additional information becomes available.

### **DISCOVERY REQUESTS**

#### **No. 1-1**

Does Genesis have an interconnection agreement with any other incumbent local exchange company (ILEC) in South Carolina? If the answer is yes, please identify the ILEC(s) and provide a list of all services Genesis is purchasing from each. In addition, please provide copies of all such interconnection agreements.

#### **No. 1-2**

Please describe Genesis's network in South Carolina, including:

- a) The facilities Genesis uses to interconnect the DS1s Genesis purchases from CenturyLink to Genesis's network, including but not limited to, the equipment type and model number of the network equipment at the collocation, the switch type and model number, the transmission facility (copper or fiber) connecting the equipment, and the capacity of the transmission facility.
- b) The transmission facilities Genesis uses to transmit the DS1 loops to its data provider and long distance provider, including but not limited to, the

transmission facility (copper or fiber) connecting the providers, and the capacity of the transmission facility.

**No. 1-3**

Please provide the following information regarding the customers Genesis serves using the DS1 loops purchased from CenturyLink:

- a) The number of customers Genesis serves using these DS1 loops.
- b) The types of services Genesis provides to these customers using these DS1 loops.
- c) If internet service is provided to any customers using the DS1 loops, the speed of the service provided by Genesis.
- d) Any documents, including but not limited to, marketing or fulfillment materials, customer contracts or advertising, relating to the speed of any internet service Genesis offers to its customers.

**No. 1-4**

Please identify any documents that support Genesis's position that 8 bits make up a byte in the field of telecommunications. Please provide copies of any documents identified in your response.

**No. 1-5**

Please provide all technical specifications and any documentation supporting Genesis's position that the DS1 loops CenturyLink provides to Genesis provide only 1/8<sup>th</sup> of the speed required by the parties' interconnection agreement.

**No. 1-6**

(a) Please provide Genesis's total annual revenues received for each of the years 2006-2009.

(b) Please provide the total compensation received by Ken Jefferson and John Lawrence relating to their employment with Genesis for each of the years 2006-2009.

Date this 11<sup>th</sup> day of December 2009.



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Attorneys for United Telephone  
Company of the Carolinas d/b/a  
CenturyLink

**CERTIFICATE OF SERVICE**

The undersigned employee of CenturyLink does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below via electronic mail and by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Genesis Telecommunications, LLC,  
Complainant/Petitioner v. United  
Telephone of the Carolinas d/b/a  
CenturyLink, Defendant/Respondent

DOCKET NO.: 2009-311-C

PARTIES SERVED: Nanette S. Edwards  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
nsedwar@regstaff.sc.gov

John Lawrence  
Genesis Telecommunications, LLC  
1117 Reynolds Avenue  
Greenwood, SC 29649  
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PLEADING: United Telephone Company of The Carolinas, LLC d/b/a  
CenturyLink's First Set of Interrogatories and Request for  
Production to Genesis Telecommunications, LLC

December 11, 2009

  
Roberta G. Cooper, Legal Secretary